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*Counsel for Movant Bridgestone
Investment Corporation Limited
and Proposed Lead Counsel for the Class*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE TESLA INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

Judge: Hon. Edward M. Chen
Date: May 2, 2019
Time: 1:30 PM
Courtroom: Courtroom 5 – 17th Floor

DECLARATION OF RAMZI ABADOU IN SUPPORT OF BRIDGESTONE INVESTMENT
CORPORATION LIMITED'S NOTICE OF MOTION AND MOTION TO STAY PROCEEDINGS
PENDING RESOLUTION OF PETITION FOR WRIT OF MANDAMUS BY THE UNITED
STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

1 I, Ramzi Abadou, hereby declare as follows:

- 2 1. I am a member in good standing of the bar of the State of California and am admitted to this
3 District.
- 4 2. I submit this Declaration, together with the attached exhibits, in support of Bridgestone
5 Investment Corporation Limited's Notice of Motion and Motion to Stay. I am fully familiar
6 with the facts stated herein.
- 7 3. Attached hereto as "Exhibit A" is a true and correct copy of the March 22, 2019 order from
8 the United States Court of Appeals for the Ninth Circuit, captioned *In re: Bridgestone*
9 *Investment Corporation Limited*, No. 19-70031 (9th Cir.).
- 10 4. Attached hereto as "Exhibit B" is a true and correct copy of the February 24, 2009 stay order
11 captioned *In re Nvidia Corporation Securities Litigation*, No. 3:08-cv-04260-RS (N.D. Cal.).

12 I declare under the penalty of perjury under the laws of the United States of America that the foregoing
13 facts are true and correct.

14 Executed on Friday, March 22, 2019, in San Francisco, California.

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16 /s/ Ramzi Abadou
17 RAMZI ABADOU
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